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BEFORE THE ARIZONA CORPORATION COMMISSION

KRISTIN K. MAYES  
Chairman

Arizona Corporation Commission

GARY PIERCE  
Commissioner

DOCKETED

PAUL NEWMAN  
Commissioner

APR 14 2010

SANDRA D. KENNEDY  
Commissioner

BOB STUMP  
Commissioner

DOCKETED BY	NR
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IN THE MATTER OF THE GENERIC  
INVESTIGATION OF TARIFFING AND  
NOTICE REQUIREMENTS FOR  
COMBINED INTERSTATE AND  
INTRASTATE CALLING PLANS

DOCKET NO. RT-00000J-05-0329

DECISION NO. 71647

ORDER

Open Meeting  
March 31 and April 1, 2010  
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On April 11, 2005, the Arizona Corporation Commission ("ACC" or "Commission") issued Decision No. 67745. Decision No. 67745 adopted a settlement agreement between the Commission's Utilities Division Staff ("Staff ") and Qwest LD Corporation ("QLDC") and its affiliates in the matter of Utilities Division v. Qwest LD Corp. (Docket No. T-04190A-04-0904). Decision No. 67745 also ordered Staff to commence a generic investigation and rulemaking proceeding to address the filing requirements and tariff obligations of interexchange carriers, therefore, this docket was opened on May 6, 2005.

2. The terms and conditions of the approved settlement agreement also included an agreement between Staff and Qwest LD Corp, its parent, affiliated companies or their successors ("Qwest") that the generic docket would be concluded within 18 months of Decision No. 67745, and an agreement by Staff that any new or additional filing requirements defined in the generic

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1 docket will have application to Qwest on only a going forward basis from the date of the final  
2 order in the generic docket. Staff initiated this generic docket on May 26, 2005.

3 3. On September 23, 2005, Staff issued its first set of data requests to inter-exchange  
4 carriers, resellers of long distance, and/or incumbent long distance providers certificated in the  
5 state of Arizona. On October 18, 2006, at Staffs' request, a telephonic procedural conference was  
6 conducted. At the conference, Staff requested an extension of time to file its report. Qwest agreed  
7 to Staffs' request for an extension.

8 4. On October 26, 2006, Staff issued an additional request for information to all  
9 certificated inter-exchange carriers, resellers of long distance, and/or incumbent long distance  
10 providers with operations in the state of Arizona. On December 19, 2006, Staff filed a  
11 Memorandum containing its findings and recommendations.

12 Background

13 5. QLDC was certificated to provide long distance service on or about December 9,  
14 2003, in Decision No. 66613. Qwest Communications Corporation ("QCC") was certificated to  
15 provide long distance service on or about December 9, 2003, in Decision No. 66612. The services  
16 of both QLDC and QCC were determined to be "competitive" by the Commission and subject to  
17 the Commission's competitive classification rules.

18 6. Shortly after receiving Section 271 authorization from the Federal Communications  
19 Corporation ("FCC"), QLDC and QCC began offering its Qwest Choice Long Distance calling  
20 plan in Arizona. Customers who subscribed to the Qwest Choice Long Distance residential calling  
21 plan prior to August 15, 2004, with service up to October 1, 2004, were assessed a \$.05/minute  
22 rate for interstate, interLATA<sup>1</sup>/intrastate, and intraLATA/intrastate long distance calls, and were  
23 subject to the monthly cap of \$20.00 (if they had a qualifying Qwest Corporation<sup>2</sup> local service  
24 home package) or \$25.00 (if they did not have a qualifying package). The calling plan was  
25 advertised to consumers as having "no monthly surcharge."

26 \_\_\_\_\_  
27 <sup>1</sup> Local Access Transport Area ("LATA"). LATA represents an area within which a divested Regional Bell operating  
28 company ("RBOC") is permitted to offer exchange telecommunications and exchange access services.

<sup>2</sup> Qwest Corporation is the incumbent local exchange carrier.

1           7.     As required by law, QLDC and QCC filed tariffs and price lists with the  
2 Commission setting forth their rates for intrastate Qwest Choice Long Distance service, as well as  
3 other long distance packages. Those tariffs and price lists became effective on December 15,  
4 2003.

5           8.     On or about August 31, 2004, QLDC sent a written notice to its existing Qwest  
6 Choice Long Distance residential customers indicating that it was instituting a new monthly charge  
7 of \$2.00 applicable on a per line basis. The notice also indicated that a \$.99 "interstate" services  
8 fee would apply on a per account basis. Both charges took effect on October 1, 2004, for existing  
9 customers and on August 16, 2004, for new customers. These charges apply to jurisdictionally  
10 intrastate long distance calls.

11          9.     QLDC did not include the new monthly charges in the price lists that it filed with  
12 the Commission on July 5, 2004, with an effective date of August 5, 2004. Qwest did, however,  
13 post new interstate rate schedules (Qwest LD Corp. RSS No. 1) which contained both of the new  
14 monthly charges.

15          10.    Shortly after QLDC gave notice of its \$2.99 monthly charge for its Qwest Choice  
16 Long Distance residential plan, the Commission began receiving complaints regarding the new  
17 charges.

18          11.    Consumers expressed considerable dismay and frustration to the Commission that  
19 Qwest had widely advertised its plan as having "No Monthly Fees", unlike the plans of other long  
20 distance carriers. In reliance on this, they signed up for the Qwest residential Calling plan, only to  
21 be informed shortly thereafter that Monthly Fees would henceforth apply. These consumers felt  
22 that Qwest had misled them into signing up for its plan, since shortly thereafter the customers were  
23 told that the plan's primary perceived benefit ("No Monthly Fee") was being eliminated.

24          12.    On December 17, 2004, the Utilities Division ("Staff") filed a Complaint and  
25 Petition For Order to Show Cause against QLDC alleging that the Qwest Choice Long Distance  
26 residential plan offers the customer the capability of making both interstate and intrastate long  
27 distance calls. Staff alleged that both interstate and intrastate calls were covered by the plan. As  
28 such, Staff believed that Qwest was required to include in its intrastate price lists and tariffs all

1 conditions of the plan applicable to intrastate long distance calls, which in this case includes the  
2 \$2.99 surcharge. Staff argued that unless QLDC is required to include all charges in its intrastate  
3 tariff which are applicable to intrastate services, QLDC could in the future impose unilateral rate  
4 increases on consumers for intrastate services without the oversight of the Commission and  
5 without complying with applicable Arizona law. Staff asserted that QLDC cloaked its new  
6 charges in an "interstate" veil to evade the Commission's oversight authority over intrastate  
7 charges.

8 13. Staff's Complaint further alleged that QLDC formerly advertised its Qwest Choice  
9 Long Distance plan as having "No Monthly Fees". The phrase "No Monthly Fees" or its  
10 equivalent was prominently featured in advertisements by QLDC for its Qwest Choice Long  
11 Distance plan.

12 14. Staff stated in its Complaint that after obtaining authority to sell long distance  
13 services from the FCC under Section 271, Qwest and QLDC engaged in a concerted joint effort to  
14 sign up existing Qwest customers to QLDC long-distance service. Part of this effort included  
15 advertisements and promotional materials that promoted QLDC's Qwest Choice Long Distance  
16 plan as having "No Monthly Fees".

17 15. Staff's Complaint also alleged that this prolonged advertising of the Qwest Choice  
18 Long Distance plan as having "No Monthly Fees" created an expectation by QLDC customers that  
19 the Qwest Choice Long Distance plan would, in fact, have no monthly fees. QLDC knew that its  
20 advertising would create this expectation.

21 16. Staff's Complaint alleged violations of A.R.S. Section 40-365 and A.A.C. R14-2-  
22 1106(B) which require public service corporations to file with the Commission schedules showing  
23 all tolls, rates, rentals, charges, and classifications to be collected or enforced. The Staff also  
24 alleged violations of A.R.S. Section 361 which requires the rates and charges of public service  
25 corporations to be just and reasonable. Related violations of A.A.C. R14-2-110(B) and/or A.A.C.  
26 R14-2-1109 were also alleged.

27 ...

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1           17.     The Staff and QLDC subsequently engaged in settlement discussions in an effort to  
2 resolve the allegations contained in the Staff Complaint. The parties entered into a Settlement  
3 Agreement dated March 31, 2005.

4           18.     Under the Settlement Agreement, Qwest agreed with Staff's interpretation of  
5 Arizona rules on an interim basis and that it will file intrastate long distance service tariffs and  
6 price lists in Arizona consistent with Staff's interpretation of the Arizona statutes and rules  
7 pending the conclusion of the generic docket or further Order of the Commission. Staff agreed to  
8 commence a generic proceeding examining the filing requirements and tariff obligations of all  
9 interexchange carriers. Qwest also agreed to file with the Commission an intrastate tariff and/or  
10 price list containing a charge equal to or equivalent to (but not in addition to) the \$2.99 monthly  
11 surcharge which is now only included in the QLDC interstate rates and service schedule. Qwest  
12 agreed to include any and all monthly charges of this nature in the applicable intrastate tariff until  
13 such time as the generic docket is concluded or until further Order of the Commission.

14           19.     Under the Settlement Agreement reached in Docket No. T-04190A-04-0904, and  
15 approved by Decision No 67745, on April 11, 2005, Qwest agreed with Staff's interpretation of  
16 Arizona rules on an interim basis and agreed to file intrastate long distance service tariffs and price  
17 lists in Arizona consistent with Staff's interpretation of the Arizona statutes and rules pending the  
18 conclusion of this generic docket or further Order of the Commission.

19           20.     Staff was ordered to commence a generic investigation and rulemaking proceeding  
20 to address the filing requirements and tariff obligations of interexchange carriers. The docket was  
21 opened on May 6, 2005.

22 Staff's Analysis & Recommendations

23           21.     Staff issued data requests to "Telecommunications Companies Holding CC&Ns in  
24 Arizona as Inter-exchange Carriers, Resellers of Long Distance, and/or Incumbent Long Distance"  
25 in this Generic Docket on September 23, 2005 and October 29, 2006.

26                   The following questions were included in the September 23, 2005 data request issued to  
27 192 Carriers:

28 ...

1. Do you impose any charges that pertain to both interstate and intrastate long distance calls on your customers that do not appear in your Arizona tariffs?
2. If your answer to number one is yes, please provide a list of all such charges.
3. If your answer to number one is yes, for each such charge please indicate whether it applies only when there is interstate usage on a customer's bill in a particular month or whether the charge applies even when all usage is intrastate.
4. If a charge that is not in your Arizona tariff applies even when all usage is intrastate, please explain why such charge should not be included in your intrastate tariff.

RESPONSES TO THE SEPTEMBER 23, 2005 DATA REQUEST:

1. 124 Carriers responded.
2. AT&T, TCG, Sprint, Custom Network Solutions, Cincinnati Bell Long Distance, SBC Long Distance, Trinsic Communications and Granite Telecommunications responded "yes" to question 1. All others responded "no", including MCI.
3. Those responding "yes" to question #1 consistently supported their position by explaining that the charges that pertain to both interstate and intrastate long distance calls that do not appear in Arizona tariffs do appear in interstate tariffs.

The following questions were included in the October 29, 2006 data request issued to the same Carriers who were issued the September 23, 2005 data request:

1. Is it permissible under Arizona Rules and Statutes for an interexchange carrier to impose surcharges that pertain to both interstate and intrastate long distance calls but not to include those surcharges in the intrastate Arizona tariff filed with the Arizona Corporation Commission? Please explain your answer in detail.
2. How should A.A.C. R12-2-1106(B)(4), A.A.C. R14-2-1109, and A.C. R14-2-1110 be interpreted with respect to charges for intrastate and interstate services provided in conjunction with each other? For example, a surcharge that applies regardless of which type (intrastate or interstate) of calls are actually made.
3. If a surcharge is said to apply to interstate toll charges only, but is also charged by the carrier when the customer makes solely intrastate toll charges, should the surcharge be included in the provider's intrastate tariff filed with the Arizona Corporation Commission and subject to the Commission's rules cited in question 2 above?
4. Should a new surcharge applicable to interstate toll calls, but which the carrier charges when solely intrastate toll calls are made, be included in the calculation of the carrier's maximum rate for purposes of A.A.C. 14-2-1110?

- 1           5. When bundled interstate and intrastate toll packages are offered, are the packages  
2           subject to both federal and state statutes, rules and requirements?

3           RESPONSES TO THE OCTOBER 29, 2006 DATA REQUEST:

- 4           1. 4 Carriers responded.
- 5           2. 2 Carriers (AT&T and Qwest) provided additional information directly responsive  
6           to the above information requests
- 7           3. AT&T's responses further clarify the AT&T responses to Staff's September 23,  
8           2005 data request and are summarized as follows:
- 9           i. The intrastate tariffs for the AT&T long distance services explain that the  
10           intrastate services are an add-on or offered in conjunction with AT&T's  
11           interstate offering.
- 12           ii. A customer must first elect to purchase an interstate rate plan from AT&T  
13           before adding an intrastate plan.
- 14           iii. There are no additional surcharges that apply to intrastate calls.
- 15           iv. If a customer chooses to make intrastate calls or interstate calls or a  
16           combination of the interstate and intrastate calls or no long distance calls at all  
17           during a particular month the charge still applies.
- 18           v. Fees first initiated under interstate plans, and not enhanced by the intrastate  
19           plans, are outside the jurisdiction of the ACC, specifically, A.A.C. R12-2-  
20           1106(B)(4), A.A.C. R14-2-1109, and A.A.C. R14-2- 1110.
- 21           4. Qwest filed comments related to Staff's October 29, 2006 information request that  
22           can be summarized as follows:
- 23           i. Qwest continues to maintain that the Fees in question in T-04190A-04-0904,  
24           and subject to Decision No. 67745, were assessed by QLDC in return for the  
25           capability provided customers to use QLDC's network to place interstate calls.
- 26           ii. Qwest also believes that the remedy sought by the Staff would directly  
27           challenge the exclusive jurisdiction Congress granted to the FCC over interstate  
28           communications and carriers.

22. The Settlement Agreement between Qwest and Staff, attached to Decision No.  
67745 as Exhibit 1, reflects Staff's belief that QLDC was required to file tariff and/or price list  
revisions with the Commission prior to implementing a \$2.99 surcharge as part of its Qwest  
Choice Long Distance calling plan, which applies to both interstate and intrastate long distance  
calls made by Arizona customers.

23. Staff's interpretation of the rules and statutes governing the tariffing obligations of long-distance carriers has not changed. Staff continues to believe that charges that apply simultaneously to both inter- and intra-state calls should be reflected in the carrier's tariffs filed with the Commission. For cases where inter-state services are provided in conjunction with intra-state services, Staff believes that including a reference in the carrier's intra-state tariff to rates contained in inter-state tariffs or inter-state price lists would satisfy this requirement.

24. Staff recommends that QLDC be given the following alternatives:

A. listing all long distance rates and charges under combined interstate/intrastate calling plans within its Arizona intrastate tariffs or

B. denoting within its Arizona intrastate tariffs those charges and rates which are listed in QLDC's interstate tariffs which also apply to intrastate calls under the combined calling plan.

25. Staff recommends that QLDC be given 90 days to modify its Arizona intrastate tariffs accordingly.

26. Additionally, Staff recommends that all intrastate long distance providers be given the same alternatives outlined above for QLDC.

27. All intrastate long distance providers should be given 90 days to modify their Arizona intrastate tariffs accordingly, if necessary.

#### CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the subject matter of this investigation.

2. The Commission, having reviewed the filing and Staff's Memorandum dated March 16, 2010, concludes that it is in the public interest to grant the recommendations as set forth in Findings of Fact Nos. 24, 25, 26 and 27.

#### ORDER

IT IS THEREFORE ORDERED that Qwest LD Corporation be given the alternatives outlined in Finding of Fact No. 24.

IT IS FURTHER ORDERED that Qwest LD Corporation be given 90 days from the effective date of this Decision to modify its Arizona intrastate tariffs accordingly.

...

1 IT IS FURTHER ORDERED that all intrastate long distance providers be given the same  
2 alternatives outlined for Qwest LD Corporation in Finding of Fact No. 24.

3 IT IS FURTHER ORDERED that all intrastate long distance providers be given 90 days  
4 from the effective date of this Decision to modify their Arizona intrastate tariffs accordingly.

5 IT IS FURTHER ORDERED that this Decision shall become effective immediately.


6  
7 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

8   
9 CHAIRMAN

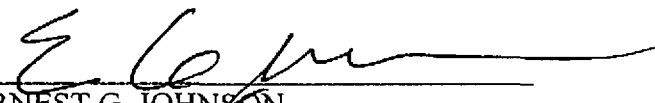
  
COMMISSIONER

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11   
12 COMMISSIONER

  
COMMISSIONER

  
COMMISSIONER

13  
14 IN WITNESS WHEREOF, I, ERNEST G. JOHNSON,  
15 Executive Director of the Arizona Corporation Commission,  
16 have hereunto, set my hand and caused the official seal of  
17 this Commission to be affixed at the Capitol, in the City of  
18 Phoenix, this 14<sup>th</sup> day of April, 2010.

18   
19 ERNEST G. JOHNSON  
20 EXECUTIVE DIRECTOR

21 DISSENT: \_\_\_\_\_

22  
23 DISSENT: \_\_\_\_\_

24 SMO:AFF:lh\MAS  
25  
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28

1 SERVICE LIST FOR: GENERIC INVESTIGATION OF TARIFFING AND NOTICE  
2 REQUIREMENTS

3 DOCKET NO. RT-00000J-05-0329

4 Manager of Regulatory Affairs  
5 1-800-Reconex, Inc. (03318)  
6 2500 Industrial Avenue  
7 Hubbard, Oregon 97032

Manager of Regulatory Affairs  
Advanced TelCom, Inc.  
110 Stony Point Road, Second Floor  
Santa Rosa, CA 95401

8 Manager of Regulatory Affairs  
9 Access One, Inc.  
10 125 North Halsted Street  
11 4th Floor  
12 Chicago, Illinois 60661

Manager of Regulatory Affairs  
Affinity Network Incorporated dba  
QuantumLink/HorizonaOne/VoIP/Optic  
Communications  
4380 Boulder Highway  
Las Vegas, Nevada 89121-3002

13 Manager of Regulatory Affairs  
14 Access Point, Inc.  
15 1100 Crescent Green, Suite 109  
16 Cary, North Carolina 27511

Manager of Regulatory Affairs  
Advantage Telecommunications, Corp.  
3001 Alona Avenue, Suite 304  
Winter Park, Florida 32792

17 Manager of Regulatory Affairs  
18 ACCXX Communications, LLC  
19 4035 Tampa Road, Suite 6000  
20 Oldsmar, Florida 34677

Manager of Regulatory Affairs  
Airespring, Inc.  
6060 Sepulveda Blvd., Suite 220  
Van Nuys, California 91411

21 Manager of Regulatory Affairs  
22 Accutel Communications, Inc.  
23 dba Valuetel Communications, Inc.  
24 1060 South Federal Highway, Suite A  
25 Delray Beach, Florida 334444

Manager of Regulatory Affairs  
Airnex Communications, Inc.  
3000 Executive Parkway, Suite 230  
San Ramon, California 94583

26 Manager of Regulatory Affairs  
27 Adelphia Telecommunications, Inc.  
28 1 North Main Street  
Coudersport, Pennsylvania 16915  
Manager of Regulatory Affairs

Manager of Regulatory Affairs  
Alltel Communications, Inc.  
One Allied Drive  
Little Rock, Arkansas 72202

ACN Communications Services, Inc.  
32991 Hamilton Court  
Farmington Hills, Michigan 48334

Manager of Regulatory Affairs  
Alliance Group Services, Inc.  
1221 Post Road East  
Westport, Connecticut 06880

Manager of Regulatory Affairs  
Advanced Telemanagement Group, Inc.  
dba ATG  
8912 East Pinnacle Peak Road, Suite 423  
Scottsdale, Arizona 85255

Manager of Regulatory Affairs  
American Cyber Corporation  
dba Discount Plus  
6053 Hudson Road, Suite 110  
Woodbury, Minnesota 55125

1	Manager of Regulatory Affairs	Manager of Regulatory Affairs
2	America Net, LLC	Americorm Technologies, Inc.
3	3435 Wilshire Boulevard, Suite 1090	dba Network Utilization Services
4	Los Angeles, California 90001	Post Office Box 990-165
5		Boston, Massachusetts 02199
6	Manager of Regulatory Affairs	
7	American Fiber Systems, Inc.	Manager of Regulatory Affairs
8	100 Meridian Centre, Suite 250	Budget Phone, Inc.
9	Rochester, New York 14618	Post Office Box 19360
10		Shreveport, Louisiana 71149
11	Manager of Regulatory Affairs	
12	American Fiber Network, Inc.	Manager of Regulatory Affairs
13	dba AFN	ASC Telecom, Inc.
14	9401 Indian Creek Parkway, Suite 140	dba AlternaTel
15	Overland Park, Kansas 66210	6391 Sprint Parkway/MS: Z2400
16		Overland Park, Kansas 66251
17	Manager of Regulatory Affairs	
18	American Phone Services, Corp.	Manager of Regulatory Affairs
19	308 Maxwell Road, Suite 100	Buehner-Fry, Inc.
20	Alpharetta, Georgia 30004	dba Resort Operator Services
21		40 N.W. Greenwood Avenue
22	Manager of Regulatory Affairs	Bend, Oregon 97701
23	American Long Lines, Inc.	
24	700 Enterprise Road, Second Floor	Manager of Regulatory Affairs
25	Horsham, Pennsylvania 19044	AT&T
26		6554 S. Zeno Ct
27	Manager of Regulatory Affairs	Aurora, Colorado 80016
28	Americatel Corporation	
29	dba 10 123 Americatel / 1010 123	Manager of Regulatory Affairs
30	4045 N.W. 97th Avenue	Business Discount Plan, Inc.
31	Miami, Florida 33178	One World Trade Center, Suite 800
32		Long Beach, California 90831
33	Manager of Regulatory Affairs	
34	American Telecom. Systems, Inc.	Manager of Regulatory Affairs
35	4450 Belden Village St., N.W., Suite 602	ATMC, Inc.
36	Canton, Ohio 44718	9045 Haven Avenue, Suite 106
37		Rancho Cucamonga, California 91730
38	Manager of Regulatory Affairs	
39	Amerivision Communications, Inc.	Manager of Regulatory Affairs
40	dba Affinity 4	Cimco Communications, Inc.
41	One Bradway Executive Park	1901 S. Meyers Road, Suite 700
42	201 NW 63rd, Suite 200	OakBrook Terrace, Illinois 60181
43	Oklahoma City, Oklahoma 73116	
44		
45		
46		
47		
48		

1 Manager of Regulatory Affairs  
2 Bell Atlantic Communications  
3 dba Verizon Long Distance  
4 1320 N. Courthouse Road, 9th Floor  
5 Arlington, Virginia 22201

6 Manager of Regulatory Affairs  
7 Cognigen Networks, Inc.  
8 7001 Seaview Avenue NW, Suite 201  
9 Seattle, Washington 98117

10 Manager of Regulatory Affairs  
11 Better World Telecom, Inc.  
12 dba Better World Telecom  
13 11921 Freedom Drive, Suite 550  
14 Reston, VA 20190

15 Manager of Regulatory Affairs  
16 ConnectAmerica, Inc.  
17 dba Connect US of Delaware  
18 1842 Centre Point Drive, Suite 128  
19 Naperville, IL 60563

20 Manager of Regulatory Affairs  
21 Broadwing Communications, LLC  
22 200 N. LaSalle Street  
23 Chicago, IL 60601

24 Manager of Regulatory Affairs  
25 CTI Long Distance, Inc.  
26 P.O. Box 800070  
27 Portland, OR 97280  
28 Manager of Regulatory Affairs

BT Communications Sales, LLC  
11440 Commerce Park Dr.  
Reston, VA 20191

Manager of Regulatory Affairs  
Custom Teleconnect, Inc.  
3111 S. Valley View, Suite E-120  
Las Vegas, NV 89102

Manager of Regulatory Affairs  
Buehner-Fry, Inc.  
dba Directdial USA  
40 N.W. Greenwood Ave.  
Bend, OR 97701

Manager of Regulatory Affairs  
D.D.D. Calling, Inc.  
6300 Richmond Avenue, Suite 304  
Houston TX 77057

Manager of Regulatory Affairs  
Business Network Long Distance, Inc.  
1400 Sixteenth Street, Suite 400  
Denver, CO 80202

Manager of Regulatory Affairs  
Dialaround Enterprises, Inc.  
30-50 Whitestone Expressway, 4th Floor  
Flushing, NY 11354

Manager of Regulatory Affairs  
Business Telecom, Inc.  
dba BTI Telecommunications Services  
7037 Old Madison Pike, Suite #400  
Huntsville, AL 35806

Manager of Regulatory Affairs  
DIECA Communications, Inc.  
dba Covad Communications Company  
3420 Central Expressway  
Santa Clara, CA 95051

Manager of Regulatory Affairs  
Casade Access, LLC  
P.O. Box 1285  
Estacada, OR 97023

Manager of Regulatory Affairs  
DSLnet Communications, LLC  
545 Long Wharf Dr., 5th Floor  
New Haven, CT 06511

1	Manager of Regulatory Affairs	Manager of Regulatory Affairs
2	Centurytel Solutions, LLC	Eschelon Telecom of Arizona, Inc.
3	100 Centurytel Drive	730 Second Avenue South, Suite 900
	Monroe, LA 71203	Minneapolis, MN 55402
4	Manager of Regulatory Affairs	Manager of Regulatory Affairs
5	Easton Telecom Services, LLC	Comcast Business
6	Sunnitt II – Unit A	dba Comcast Long Distance
7	3046 Brecksville Road	1500 Market St.
8	Richfield, OH 44286	34 East
		Philadelphia, PA 19102
9	Manager of Regulatory Affairs	Manager of Regulatory Affairs
10	CI2, Inc.	Exergy Group, Inc.
11	200 Galleria Parkway, Suite 1200	1550 West 84th Street, Suite 58
12	Atlanta, GA 30339	Hialeah, FL 33014
13	Manager of Regulatory Affairs	Manager of Regulatory Affairs
14	Econodial, LLC	Comm South Companies, Inc.
15	50 Broadway, Suite 1205	8035 E. RL Thornton, Suite 410
16	New York, NY 10004	Dallas, TX 75228
17	Manager of Regulatory Affairs	Manager of Regulatory Affairs
18	CityNet Arizona, LLC	Frontier Communications of America, Inc.
19	113 Platinum Dr.	180 South Clinton Avenue, Fifth Floor
20	Bridgeport, WV 26330	Rochester, NY 14646
21	Manager of Regulatory Affairs	Manager of Regulatory Affairs
22	Enhanced Communication	Comtech 21, LLC
23	dba Asian American Association	One Barnes Park South
24	1031 S. Gendora Avenue	Wallingford, CT 06492
25	West Covina, CA 91790	
26	Manager of Regulatory Affairs	Manager of Regulatory Affairs
27	Clear World Communications Corporation	GC Acquisition Limited
28	3601 S. Harbor Blvd.	dba Global Crossing
	Santa Ana, CA 92704	1080 Pittsford Victor Road
		Pittsford, NY 14534
29	Manager of Regulatory Affairs	Manager of Regulatory Affairs
30	Entrix Telecom, Inc.	Covista, Inc.
31	520 Broad St.	721 Broad St., Suite 200
32	Newark, NJ 07102	Chattanooga, TN 34702
33	Manager of Regulatory Affairs	
34	Coast International, Inc.	
35	14303 W. 95th St.	
36	Lenexa, KS 66215	

1	Manager of Regulatory Affairs Globalcom, Inc.	Manager of Regulatory Affairs Dial-Thru, Inc.
2	333 W. Wacker Drive , 15th Floor	17383 Sunset Blvd., Suite 350
3	Chicago, IL 60606	Pacific Palisades, CA 90272
4	Manager of Regulatory Affairs CTC Communications Corp.	Manager of Regulatory Affairs Intermedia Communications, Inc.
5	220 Bear Hill Road	201 Spear St., 9th Floor
6	Waltham, MA 02451	San Francisco, CA 94105
7	Manager of Regulatory Affairs Gold Line Telemanagement, Inc.	Manager of Regulatory Affairs DNR Enterprises, LLC
8	180 West Beaver Creek Road	dba Desert Wind Communications
9	Richmond Hill, ON L4B1B4	3404 West Cheryl Drive, Suite A175
10	Manager of Regulatory Affairs Custom Network Solutions, Inc.	Phoenix, AZ 85051
11	210 Route 4 East, Suite 102	Manager of Regulatory Affairs Inter-Tel Netsolutions, Inc.
12	Paramus, NJ 07652	1615 S. 52nd St.
13	Manager of Regulatory Affairs GTC Telecom	Tempe, AZ 85281
14	3151 Airway Avenue, Suite P-3	Manager of Regulatory Affairs Encompass Communications, LLC
15	Costa Mesa, CA 92626	119 W. Tyler, Suite 260
16	Manager of Regulatory Affairs Cypress Communications Operating	Longview, TX 75601
17	Company, Inc.	Manager of Regulatory Affairs ITC^Deltacom Communications
18	15 Piedmont Center, Suite 100	4092 South Memorial Parkway
19	Atlanta, GA 30305	Huntsville, AZ 35802
20	Manager of Regulatory Affairs ICG Telecom Group, Inc.	Manager of Regulatory Affairs Ernest Communications, Inc.
21	161 Inverness Drive West, Suite 100	5275 Triangle Pkwy, Suite 150
22	Englewood, CO 80112	Norcross, GA 30092
23	Manager of Regulatory Affairs Dancris Telecom, LLC	Manager of Regulatory Affairs KMC Data, LLC
24	6900 E. Camelback Road, Suite 1003	KMC Telecom V, Inc.
25	Scottsdale, AZ 82251	KMC Data, LLC
26	Manager of Regulatory Affairs Infonet Telecommunications Corporation	1755 North Brown Road
27	2160 East Grand Avenue	Lawrenceville, GA 30043
28	El Segundo, CA 90245	

1	Manager of Regulatory Affairs	Mr. Patrick Crocker
2	Excel Telecommunications, Inc.	Global Internetworking, Inc.
3	2440 Marsh Ln	900 Comerica Bldg.
	Carrollton, TX 75006	Kalamazoo, MI 49007
4	Manager of Regulatory Affairs	Manager of Regulatory Affairs
5	LDC Telecommunications, Inc.	MGEN Services Corp.
6	c/o InterControllers	2510 N. Redhill Ave., Suite 230
7	0012 N. Dale Mabry Hwy, Suite 215	Santa Ana, CA 92705
8	Tampa, FL 33618	
9	Manager of Regulatory Affairs	Manager of Regulatory Affairs
10	Extelcom, Inc.	Granite Telecommunications, LLC
11	dba Express Tel	234 Copeland ST.
12	324 S. State, Suite 125	Quincy, MA 02169
13	Salt Lake City, UT 84111	
14	Manager of Regulatory Affairs	Manager of Regulatory Affairs
15	Least Cost Routing, Inc.	National Directory Assistance, LLC
16	dba Long Distance Charges	12700 Shelbyville Road
17	40 Luce DelSol #1	Danville Bldg.
18	Henderson, NV 89011	Louisville, KY 40243
19	Manager of Regulatory Affairs	Manager of Regulatory Affairs
20	FirstMile Services, LLC	HJN Telecom, Inc.
21	dba FirstMile Technologies	dba Reliant Communications, Inc.
22	750 Liberty Drive	801 International Parkway, 5th Floor
23	Westfield, IN 46074	Lake Mary, FL 32746
24	Manager of Regulatory Affairs	Manager of Regulatory Affairs
25	Legent Communications Corporation	Network Billing Systems, LLC
26	21084 Bake Pkwy, Suite 108	155 Willowbrook Blvd.
27	Lake Forest, CA 92618	Wayne, NJ 07470
28	Manager of Regulatory Affairs	Manager of Regulatory Affairs
	France Telecom Corporate Solutions, LLC	IDT America, Corp.
	2300 Corporate Park Drive	520 Broad Street
	Mailstop SP0606	Newark, NJ 07102
	Herndon, VA 20171	
	Mr. Patrick Crocker	Manager of Regulatory Affairs
	Main Street Telephone Company	Network Enhanced Technologies, Inc.
	900 Comerica Bldg.	700 S. Flower Street, Suite 420
	Kalamazoo, MI 49007	Los Angeles, CA 90017
		Manager of Regulatory Affairs
		Infone, LLC
		11200 Murray Scholls Place
		Beaverton, OR 97007

1	Manager of Regulatory Affairs	Manager of Regulatory Affairs
2	Network Operator Services, Inc.	Nosva Limited Partnership
3	P.O. Box 3529	dba CierraCom Systems
4	Longview, TX	4380 Boulder Highway
5		Las Vegas, NV 89121-3002
6	Manager of Regulatory Affairs	
7	Inmark, Inc.	Manager of Regulatory Affairs
8	dba Preferred Billing	LDMI Long Distance
9	7300 Hudson Blvd., Suite 265	27777 Franklin Rd., Suite 500
10	Oakdale, MN 55128	Southfield, MI 48034
11	Manager of Regulatory Affairs	
12	New Century Telecom, Inc.	Manager of Regulatory Affairs
13	8180 Greensboro Dr., Suite 700	Ntera, Inc.
14	McLean, VA 22102	1020 N.W. 163rd Drive
15		Miami, FL 33169
16	Manager of Regulatory Affairs	
17	Ionex Communications North, Inc.	Manager of Regulatory Affairs
18	2020 Baltimore Ave.	Legacy Telecommunications Corporation
19	Kansas City, MO 64108	4726 Shavano Oak, Suite 101
20		San Antonio, TX 78249
21	Manager of Regulatory Affairs	
22	Nobelstel, LLC	Manager of Regulatory Affairs
23	5759 Fleet St.	OLS, Inc.
24	Carlsbad, CA 92008	217 Roswell St., Suite 100
25		Alpharetta, GA 30004
26	Manager of Regulatory Affairs	
27	KDDI America, Inc.	Manager of Regulatory Affairs
28	c/o Patrick Crocker	Level 3 Communications, LLC
	900 Comerica Bldg	1025 Eldorado Blvd.
	Kalamazoo, MI 49007	Broomfield, CO 80021
	Manager of Regulatory Affairs	Manager of Regulatory Affairs
	North County Communications	Onelink Communications, Inc.
	Corporations	8400 N. University Drive, Suite 204
	3802 Rosencrans, Suite 485	Tamarac, FL 33321
	San Diego, CA 92110	
	Manager of Regulatory Affairs	Manager of Regulatory Affairs
	LCR Telecommunications, LLC	Long Distance Consolidated Billing Co.
	100 W. Big Beaver Rd., Suite 200	7111 Dixie Hwy, Suite 211
	Troy, MI 48084	Clarkston, MI 48340
	Manager of Regulatory Affairs	Manager of Regulatory Affairs
	OnFiber Carrier Services, Inc.	OnFiber Carrier Services, Inc.
	11921 N. Mopac Expressway, Suite 100	11921 N. Mopac Expressway, Suite 100
	Austin, TX 78759	Austin, TX 78759

1	Manager of Regulatory Affairs	Manager of Regulatory Affairs
2	LoTel	Network Communications Internat'l Corp.
3	dba Coordinated Billing Services	1809 Judson Road
4	4646 Devonshire Circle	Longview, TX 75605
5	Shorewood, MN 55331	
6	Manager of Regulatory Affairs	Manager of Regulatory Affairs
7	Pac-West Telecomm, Inc.	Pronet Communications, Inc.
8	1776 W. March Ln, Suite 250	3290 Blazer Pkwy., Suite 201
9	Stockton, CA 95207	Lexington, KY 40509
10	Manager of Regulatory Affairs	Manager of Regulatory Affairs
11	Matrix Telecom, Inc.	New Edge Network
12	2912 Lakeside Drive	3000 Columbia House Blvd., Suite 106
13	Oklahoma, OK 73120	Vancouver, WA 98661
14	Manager of Regulatory Affairs	Manager of Regulatory Affairs
15	PNG Telecommunications, Inc.	Qwest Communications Corporation
16	P.O. Box 1848	1801 California St., Rm. 1240
17	West Chester, OH 45071	Denver, CO 80202
18	Manager of Regulatory Affairs	Manager of Regulatory Affairs
19	McLeodUSA Telecommunications	Norstan Network Services, Inc.
20	Services, Inc.	4805 Independence Pkwy, Suite 101
21	6400 C Street	Tampa, FL 33634
22	P.O. Box 3177	Manager of Regulatory Affairs
23	Cedar Rapids, IA 52406	R2C Communications, Inc.
24	Manager of Regulatory Affairs	9532 Mission Rd., #25
25	Preferred Carrier Services, Inc.	Overland, KS 66206
26	dba Phones For All / Teléfonos Para	Manager of Regulatory Affairs
27	14681 Midway Road, Suite 105	Nos Communications, Inc.
28	Addison, TX 75001	dba International Plus
	Manager of Regulatory Affairs	4380 Boulder Highway
	NECC Telecom, Inc.	Las Vegas, NV 89121-3002
	605 North Shore Drive	Manager of Regulatory Affairs
	Jeffersonville, In 47130	Reduced Rate Long Distance, LLC
	Manager of Regulatory Affairs	1800 Rembrooke Dr., Suite 300
	Primo Communications, Inc.	Orlando, FL 32810
	617 Birchtree Ct.	Manager of Regulatory Affairs
	Rochester Hills, MI 48306	NTS Communications, Inc.
		5307 W. Loop 289
		Lubbock, TX 79414

1 Manager of Regulatory Affairs  
RRV Enterprises, Inc.  
2 dba Consumer Access  
3 6300 Richmond Avenue, Suite 303  
Houston, TX 77057

4 Manager of Regulatory Affairs  
5 One Point Communications  
6 dba Verizon Avenue  
Two Conway Park  
7 150 Field Drive, Suite 300  
Lake Forest, IL 60045

8 Manager of Regulatory Affairs  
9 Snip Link, LLC  
10 100-A Twinbridge DR.  
Pennsauken, NJ 08110

11 Mr. Patrick Crocker  
12 OPEX Communications  
13 900 Comerica Bldg.  
14 Kalamazoo, MI 49007

15 Manager of Regulatory Affairs  
Startec Global Licensing Company  
16 1151 Seven Locks Rd.  
17 Potomac, MD 20854

18 Manager of Regulatory Affairs  
Orbitcom, Inc.  
19 1701 N. Louise Ave.  
20 Sioux Falls, SD 57107

21 Manager of Regulatory Affairs  
T.N.C., Inc.  
22 7310 Woolworth Ave.  
23 Omaha, NE 68124

24 Manager of Regulatory Affairs  
Paetec Communications, Inc.  
25 One Paetec Plaze  
26 600 Willowbrook Office Park  
Fairport, NY 14450

Mr. Patrick Crocker  
Telco Partners, Inc.  
900 Comerica Bldg.  
Kalamazoo, MI 49007

Manager of Regulatory Affairs  
Popp Telcom Incorporated  
620 Mendelssohn Ave. N  
Golden Valley, MN 55427

Manager of Regulatory Affairs  
Teledata Solutions, Inc.  
200 N. Westlake Blvd., Suite 104  
Westlake Village, CA 91362

Manager of Regulatory Affairs  
Primus Telecommunications, Inc.  
7901 Jones Branch Dr., Suite 900  
McLean, VA 22102

Manager of Regulatory Affairs  
Telefyne Incorporated  
4286 Woodbine Rd., Suite B  
Pace, FL 32571

Manager of Regulatory Affairs  
PT - 1 Long Distance  
30 - 50 Whitestone Expressway  
Flushing, NY 11354

Manager of Regulatory Affairs  
Teleglobe America, Inc.  
One Discovery Square  
12010 sunset Hills Rd  
Reston, VA 20190

Manager of Regulatory Affairs  
QuantumShift Communications, Inc.  
2657 Alcosta Blvd., Suite 418  
San Ramon, CA 94583

Manager of Regulatory Affairs  
Telemanagement Systems, Inc.  
12150 E. Briarwood Ave., Suite 146  
Centennial, CO 80112

1	Manager of Regulatory Affairs	Manager of Regulatory Affairs
2	Qwest LD Corporation	Snet America, Inc.
3	dba Qwest Long Distance	dba SBC Long Distance East
4	1801 California St., Room 1240	310 Orange ST., 3rd Floor
5	Denver, CO 80202	New Haven, CT 06510
6	Manager of Regulatory Affairs	Manager of Regulatory Affairs
7	Telmex USA, LLC	Trinsic Communications, Inc.
8	c/o Visiology, Inc.	601 South Harbour Island Blvd.
9	16061 Carmel Bay Dr.	Tampa, FL 33602
10	Northport, AL 35475	Manager of Regulatory Affairs
11	Manager of Regulatory Affairs	Sprint Communications Company LP
12	Rio Virgin Telephone & Cablevision	6391 Sprint Parkway
13	P.O. Box 1285	MS: Z2400
14	Estacada, OR 97023	Overland Park, KS 66251
15	Manager of Regulatory Affairs	Manager of Regulatory Affairs
16	Telscape Communications, Inc.	TTI National, Inc.
17	606 E. Huntington Dr.	201 spear St., 9th Floor
18	Monrovia, CA 91016	San Francisco, CA 94105
19	Manager of Regulatory Affairs	Manager of Regulatory Affairs
20	Rural Network Services, Inc.	Talk America, Inc.
21	2205 Keithley Creek Rd.	6805 Route 202
22	P.O. Box 217	New Hope, PA 18938
23	Midvale, ID 83645	Manager of Regulatory Affairs
24	Manager of Regulatory Affairs	US LEC Communications, Inc.
25	Time Warner Telecom of Arizona, LLC	6801 Morrison Blvd.
26	10475 Park Meadows Dr., Suite 400	Charlotte, NC 28211
27	Littleton, CO 80124	Manager of Regulatory Affairs
28	Manager of Regulatory Affairs	TCG Phoenix
	SBC Long Distance, LLC	6554 S. Zeno Ct.
	5850 W. Las Positas Blvd.	Aurora, CO 80016
	Pleasanton, CA 94588	USA Digital Communications
	Manager of Regulatory Affairs	1603 SE 19th Street, Suite 120
	Trans National Communications	Edmond, OK 73013-6621
	International, Inc.	Manager of Regulatory Affairs
	2 Charlesgate West	TDS Long Distance
	Boston, MA 02215	525 Junction Rd.
		Madison, WI 53717

1 Manager of Regulatory Affairs  
2 Vanion Telecom, Inc.  
3 2 North Cascade, Suite 900  
4 Colorado Springs, CO 80903  
5  
6 Manager of Regulatory Affairs  
7 Telecare, Inc.  
8 444 Lafayette Rd  
9 Noblesville, IN 46060  
10  
11 Manager of Regulatory Affairs  
12 VarTec Solutions, Inc.  
13 2440 Marsh Lane  
14 Carrollton, TX 75006  
15  
16 Manager of Regulatory Affairs  
17 Telecom Resources, Inc.  
18 2020 Baltimore Ave.  
19 Kansas City, MO 64108  
20  
21 Manager of Regulatory Affairs  
22 Vycera Communications, Inc.  
23 12750 High Bluff Drive, Ste. 200  
24 San Diego, CA 92130  
25  
26 Manager of Regulatory Affairs  
27 Teleconnect Long Distance Services and  
28 Systems  
dba Telecom\*USA  
201 Spear St., 9th Floor  
San Francisco, CA 94105  
20  
21 Manager of Regulatory Affairs  
22 Wilshire Connection, LLC  
23 633 West Street, 56th Floor  
24 Los Angeles, CA 90071  
25  
26 Manager of Regulatory Affairs  
27 Teledias Communications, Inc.  
28 5605 Riggins Ct., Suite 265  
Reno, NV 89502

Manager of Regulatory Affairs  
Working Assets Funding Service  
dba Working Assets Long Distance  
101 Market St., Suite 700  
San Francisco, CA 94105

Manager of Regulatory Affairs  
Teleuno, Inc.  
2754 N. Atlantic Blvd., Suite 8  
Pompano Beach, FL 33069

Manager of Regulatory Affairs  
Xspedius Management Co. of Pima  
County, LLC  
Xspedius Management Co. Switched  
Services, LLC  
14405 Laurel PL, Suite 200  
Laurel, MD 20707

Manager of Regulatory Affairs  
Telliss, LLC  
10142 Brooks School Road, Suite 198  
Fisher, IN 46038

Manager of Regulatory Affairs  
Zenex Long Distance, Inc.  
3705 W. Memorial, Ste. 101 - Z  
Oklahoma City, OK 73134

Manager of Regulatory Affairs  
The J. Richard Company  
dba Live Wire Phone Company  
4607 E. Molly Ln  
Cave Creek, AZ 85331

Manager of Regulatory Affairs  
Zone Telecom, Inc.  
200 Lake Dr. East, Suite 200  
Cherry Hill, NJ 08002

Manager of Regulatory Affairs  
TON Services, Inc.  
4185 Harrison Blvd., Suite 301  
Ogden, UT 84403

1	Manager of Regulatory Affairs	
2	Verizon Select Services, Inc.	Manager of Regulatory Affairs
3	6665 N. MacArthur Blvd.	Uni-Tel Communications Group, Inc.
4	HOK02K84	47 East Chicago Avenue #328
5	Irving, TX 75039-2443	Naperville, IL 60540
6	Manager of Regulatory Affairs	Manager of Regulatory Affairs
7	Transcom Communications, Inc.	US Wats, Inc.
8	dba Comm Port Communications	2 Greenwood Square
9	1925 John Carpenter Freeway, Suite 540	3331 Street Road, Suite 275
10	Irving, TX 75063	Bensalem, PA 19020
11	Manager of Regulatory Affairs	Manager of Regulatory Affairs
12	Transworld Network, Corp.	Valley Connections, LLC
13	7702 Woodland Center Blvd, Suite 50	P.O. Box 970
14	Tampa, FL 33614	Wilcox, AZ 85644
15	Manager of Regulatory Affairs	Manager of Regulatory Affairs
16	X2Comm, Inc.	Vartec Telecom, Inc.
17	dba DC Communications	dba Vartec Telecom (R) / Clear Choice
18	270 South Main Street	Communications
19	Flemington, NJ 08822	2440 March Lane
20	Manager of Regulatory Affairs	Carrollton, TX 75006
21	U.S. South Communications, Inc.	Steven M. Olea, Director
22	dba Incomm	Utilities Division
23	250 Williams St., Suite 2360	Arizona Corporation Commission
24	Atlanta, GA 30303	1200 West Washington Street
25	Manager of Regulatory Affairs	Phoenix, Arizona 85007
26	Yak Communications, Inc.	Janice Alward, Chief Counsel
27	300 Consilium PL	Legal Division
28	Scarborough, ON M1P4X4	Arizona Corporation Commission
	Manager of Regulatory Affairs	1200 West Washington Street
	United States Advanced Network, Inc.	Phoenix, Arizona 85007
	3080 Northwoods Circle	
	Norcross, GA 30071	